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January 26, 2006

Office of the Comptroller of the
Currency
250 E Street, SW
Public Reference Room
Mail Stop 1-5
Washington, DC 20219
Attn.: Docket No. 05-21

Robert E. Feldman
Executive Secretary
Attn: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Attn.: Docket No. 2005-56

Jennifer Johnson
Secretary
Board of Governors of the
Federal Reserve System
20th St. and Constitution Ave, NW
Washington, DC 20551
Attn.: Docket No. OP-1246

Re: Proposed Guidance- Interagency Guidance on Nontraditional Mortgage Products

Dear Sir or Madam:

The Independent Community Bankers of America (ICBA)¹ appreciates the opportunity to offer comments on the proposal by the Office of the Comptroller of the Currency, the Office of Thrift Supervision, the Federal Deposit Insurance Corporation, and the Federal Reserve on the Proposed Interagency Guidance on Nontraditional Mortgage Products.

The ICBA expects to file comments on the Proposed Guidance, but we would like to request that the Agencies extend the current comment deadline of February 27, 2006

¹The Independent Community Bankers of America represents the largest constituency of community banks of all sizes and charter types in the nation, and is dedicated exclusively to representing the interests of the community banking industry. ICBA aggregates the power of its members to provide a voice for community banking interests in Washington, resources to enhance community bank education and marketability, and profitability options to help community banks compete in an ever-changing marketplace. With nearly 5,000 members, representing more than 17,000 locations nationwide and employing over 260,000 Americans, ICBA members hold more than \$631 billion in insured deposits, \$778 billion in assets and more than \$493 billion in loans to consumers, small businesses and the agricultural community. For more information, visit ICBA's website at www.icba.org.

by thirty (30) days. The proposed guidance was published in the Federal Register on December 29, 2006. In order for community bankers to analyze and evaluate the proposal completely, the extra time is necessary. As you are aware, the proposal is quite complex and has broad implications for our members. The 30-day extension would allow us to provide the most comprehensive and meaningful comments possible.

We appreciate your consideration of the requested 30-day extension. We encourage you to reach a decision quickly.

Sincerely,



Ann M. Grochala
Director of Lending and Accounting Policy